

THE LAW OFFICE OF RICHARD E. LERNER, P.C.

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May 10, 2013

Hon. I. Leo Glasser
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

May 12, 2013 – **AMENDED** Movant respectfully informs the court that the government did confirm by email its consent to this request for extension, now fully consented, but it was received only after this letter had been filed.

Re: Motions to Unseal 98-cr-1101
Docket No. 12-MC-150

Dear Judge Glasser:

I write in behalf of Mr. Oberlander and in behalf of his client Palmer to request a one-week extension of time to reply to the government's letter of April 26th. Counsel for "John Doe" has already consented; I have not yet heard back from the government. Counsel for "Doe" confirmed his intention not to respond, which would have been due May 3, by email on May 5. Consequently, under normal rules Reply, if any, would be due today, May 10, though this court's rules dictate that counsel are to make their own scheduling orders and so inform the court.

The reason for the request is that we have just today received a letter from the U.S. Supreme Court suggesting that we apply for this court to unseal the portions of the March 14th Order referred to in our petition for rehearing or otherwise confirm that there is no sealing order as to them. We will follow-up with our formal request in this regard next week, as well as other matters always intended to be incorporated into the reply, and therefore request a one-week enlargement of time to respond to the government's April 26, 2013 letter.

Respectfully submitted,

THE LAW OFFICE OF RICHARD E. LERNER, P.C.

/s/ Richard E. Lerner

cc: All counsel, via ECF